

REMARKS/ARGUMENTS

Status

In the May 17, 2007 office action, claims 2-31 were all rejected under 35 U.S.C. 103(a) as being unpatentable over Harari, et al (US 5,887,145) (hereinafter referred to as “Harari”) in view of Hosaka, et al (US 6,408,352) (hereinafter referred to as “Hosaka”).

Amendments to Independent Claim 2

Applicant has amended independent claim 2 to clarify what are believed to be patentable distinctions over the art cited. Among these distinctions, the removable expansion card now recites:

“host-interconnect adapted to couple with the portable host” and
“I/O adapter circuitry adapted to couple to the external communications subsystem”.

The coexistence of the above two limitations is made explicit to clarify that they are two distinct structural aspects of the removable expansion card and that they couple to completely different things external to the removable expansion card. As the as-filed specification makes clear at paragraphs [0039], [0043], and claim 1, the claimed “host-interconnect” is a connector (illustrated in Figs. 11, 12A, and 12B) adapted to couple the removable expansion card with a portable host. The as-filed specification also makes clear at paragraphs [0040], [0044], and claim 1, that the claimed “I/O adapter circuitry” couples to external I/O, such as the types found on the right side of Fig. 8.

Prior to the above amendments, it is believed that the Examiner may have been reading the cited “I/O adapter circuitry” (such as explicitly appeared in claim 4 prior to this amendment) onto Harari’s “host interface 54 and communication adapter 12” (as in paragraph 9 of the office action). (It is respectfully noted that Harari’s identifier 12 refers to a connector, variously referred to by Harari as a “standard connector” and a “host connector”.) While it is the case that Harari’s host connector 12 is comparable to the claimed “host-interconnect”, it is believed that

Harari's host interface 54 does not read on the claimed "I/O adapter circuitry adapted to couple to the external communications subsystem" of amended claim 2.

Amended independent claim 2 also now recites:

wherein . . . "the subscriber services information contained in the removable module is used to determine capabilities of the portable host with respect to use of the subscriber service available via the external communications subsystem coupled to the I/O adapter circuitry".

The Examiner (in paragraph 18 of the office action) noted that Hosaka indicates that at least some embodiments of his "card connection adapter" will work with SIM cards. However, Hosaka's teachings pertain to preventing unwanted insertion or removal of removable small-size cards (including, but not limited to SIM cards). Even if Harari's devices were modified via Hosaka's teachings to prevent unwanted insertion or removal of small-size cards, and even if those small-size cards included SIM cards, and even if Harari's devices so-modified made use of the SIM card functionality, such a combination does not read on the claimed removable expansion card of amended claim 2 having "I/O adapter circuitry adapted to couple to the external communications subsystem" and the claimed "to determine capabilities of the portable host with respect to use of the subscriber service available via the external communications subsystem coupled to the I/O adapter circuitry".

As it has been demonstrated that multiple of the claimed limitations of amended claim 2 are not found in or suggested by the combination of Harari and Hosaka, it is believed that it would be improper to sustain the 103(a) rejection in view of the amendments to claim 2.

Amendments to the Dependent Claims

Dependent claim 4 has been canceled, reflecting that its I/O adapter circuitry limitation was promoted into independent claim 2, and to avoid resulting double inclusion in claim 4 and claims depending therefrom. Similarly, dependent claim 7 has been canceled as its limitations

now appear in independent claim 2. Dependent claims 5-6 and 8-12, which formerly were dependent on claim 4, have been amended to now depend from claim 2.

Information Disclosure Statement

The Examiner's attention is drawn to an information disclosure statement (IDS) being submitted herewith. As the IDS is being submitted in conjunction with an RCE, it is believed that the fee set forth in 37 CFR 1.17(p) is not required. However, a general fee authorization has been included below.

Request for Reconsideration and Closing

Reconsideration of the claims is respectfully requested, in view of the foregoing. It is believed that no new matter has been introduced via this amendment. Claim 2-3, 5-6, and 8-31 remain pending in the application. In view of the foregoing, all of the claims now pending in this application are believed by Applicant to be in condition for allowance. The issuance of a formal Notice of Allowability at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of the application, please telephone the undersigned at the number indicated below. The Commissioner is hereby authorized to deduct any fees required by this submission under 37 CFR 1.16 and 1.17 from, or to credit any overpayments to, Deposit Account No. 50-0689.

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